

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO, *et
al.*,
Debtors.¹

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)
Re: ECF Nos. 22262 and 23363

**MOTION SUBMITTING REVISED PROPOSED ORDER GRANTING THE FIVE
HUNDRED TWENTY-NINTH OMNIBUS OBJECTION (SUBSTANTIVE) OF
THE COMMONWEALTH OF PUERTO RICO TO DUPLICATE AND
NO LIABILITY BOND CLAIMS**

To the Honorable United States District Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Commonwealth of Puerto Rico (the “Commonwealth”) pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully submits this motion submitting a revised proposed order

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

granting the *Five Hundred Twenty-Ninth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Duplicate and No Liability Bond Claims* [ECF No. 22262] (the “Five Hundred Twenty-Ninth Omnibus Objection”).

1. On September 16, 2022, the Commonwealth, by and through the Oversight Board, filed the Five Hundred Twenty-Ninth Omnibus Objection.

2. Thereafter, on January 25, 2023, the Commonwealth, by and through the Oversight Board, filed the *Notice of Presentment of Proposed Order Granting the Five Hundred Twenty-Ninth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Duplicate and No Liability Bond Claims* [ECF No. 23363] the (“Notice of Presentment”), which included, as Exhibit A thereto [ECF No. 23363-1], a proposed order (the “Proposed Order”) granting the relief requested in the Five Hundred Twenty-Ninth Omnibus Objection.

3. Upon further review, the Proposed Order did not include certain clarifying language that the Oversight Board agreed to insert at the request of a claimant subject to the Five Hundred Twenty-Ninth Omnibus Objection.

4. Accordingly, attached hereto as Exhibit 1 is a revised proposed order (the “Revised Proposed Order”) incorporating that clarifying language, and attached hereto as Exhibit 2 is a redline identifying all changes to the Proposed Order.

WHEREFORE, the Oversight Board respectfully requests that this Honorable Court take notice of this filing and enter the Revised Proposed Order granting the Five Hundred Twenty-Ninth Omnibus Objection.

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Dated: February 16, 2023
San Juan, Puerto Rico

Respectfully submitted,

/s/ Ricardo Burgos Vargas

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